

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Case No. 1:19-mj-231
ALLISON ELIZABETH FLUKE-EKREN,	)	
a/k/a "Allison Elizabeth Brooks,"	)	
a/k/a "Allison Ekren,"	)	
a/k/a "Umm Mohammed al-Amriki,"	)	
a/k/a "Umm Mohammed,"	)	
a/k/a "Umm Jabril,"	)	
	)	
Defendant.	)	

**CONSENT MOTION TO EXTEND TIME FOR INDICTMENT  
AND MEMORANDUM IN SUPPORT**

The United States of America, by and through undersigned counsel, with the express consent of ALLISON ELIZABETH FLUKE-EKREN ("the defendant" or "Fluke-Ekren"), and the defendant's counsel, respectfully move the Court to extend the time to indict this case from February 27, 2022 to April 28, 2022. In support thereof, the parties state as follows:

1. On May 15, 2019, the Court authorized a criminal complaint charging the defendant with providing and conspiring to provide material support or resources to a foreign terrorist organization, namely the Islamic State of Iraq and al-Sham ("ISIS"), in violation of 18 U.S.C. 2339B. The defendant was transferred into the custody of the FBI overseas on January 28, 2022, at which point she was brought to the Eastern District of Virginia ("EDVA") on the same day. On January 31, 2022, the defendant made an initial appearance in this Court. On February 3, 2022, the defendant was ordered detained pending trial.

2. As alleged by the government, Fluke-Ekren is a 42-year-old former resident of Kansas who traveled to Syria for the purpose of committing or supporting terrorism. Fluke-Ekren departed the United States in or around 2008 and moved to Egypt.<sup>1</sup> Fluke-Ekren resided in Egypt until in or around 2011 (including periodic visits to the United States between 2008 – 2011), at which point she moved to Libya for approximately one year. In or around 2012, Fluke-Ekren and others with whom she traveled were smuggled into Syria.

3. As further alleged by the government, Fluke-Ekren's ISIS-related conduct includes, but is not limited to, planning and recruiting operatives for a potential future attack on a college campus inside the United States and serving as the appointed leader and organizer of an ISIS military battalion located in Syria, known as the Khatiba Nusaybah, in order to train women on the use of automatic firing AK-47 assault rifles, grenades, and suicide belts.<sup>2</sup> Additionally, the government has alleged that Fluke-Ekren provided ISIS and ISIS members with services, which included providing lodging, translating speeches made by ISIS leaders, teaching extremist ISIS doctrine, and training children on the use of automatic firing AK-47 assault rifles, grenades, and suicide belts.

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<sup>1</sup> According to travel records, Fluke-Ekren has not been in the United States since on or about January 8, 2011, until she was transferred in custody to EDVA on January 28, 2022.

<sup>2</sup> For example, according to evidence proffered by the government, in the 100th issue of *al-Naba* (a former ISIS newspaper), which was distributed on or about October 5, 2017, ISIS urged women to fight on the battlefield alongside men in order to defend the terrorist organization. In the article, "The Duty of Women in Waging Jihad Against the Enemy," the author explained that in the context of the war on ISIS, "it is mandatory for the Muslim women to fulfill their duty from all aspects in supporting the *mujahideen* [male fighters] in this battle, by preparing themselves as *mujahidat* [female fighters] in the cause of Allah, and readying to sacrifice themselves to defend the religion of Allah."

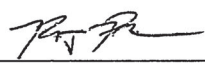
3. The Speedy Trial Act requires that the defendant be indicted within 30 days of the defendant's arrest after subtracting all excludable time. A conservative estimate of the indictment deadline is February 27, 2022. The parties jointly request an extension of approximately 60 days, to April 28, 2022, for an extension of the time to indict. Extending this time period would be in the best interests of justice in that it would give defense counsel an opportunity to continue meeting with the defendant, review discovery that the government has provided and will continue to provide to the defense, and to discuss a possible pre-indictment plea resolution of the case. Additionally, the two members of the prosecution team on this case are scheduled to begin a three to four-week jury trial in this Court on March 29, 2022 for a separate case involving terrorism charges (unconnected to Fluke-Ekren) relating to an ISIS hostage-taking scheme that resulted in the deaths of four American citizens, as well as the deaths of British and Japanese nationals, in Syria (*United States v. El Shafie Elsheikh*, 1:20-cr-239).

5. The defendant hereby agrees to waive any objections under the Speedy Trial Act as it pertains to this motion and to extend the government's time to file an indictment in this case through and including April 28, 2022. The waiver is made knowingly, intentionally, and voluntarily by the defendant, and with full knowledge of the provisions of the Speedy Trial Act, Title 18, United States Code, Sections 3161, *et seq.*, and with the advice and consent of counsel.

6. The defendant expressly understands that her waiver is not predicated upon any promises, agreements, or understandings of any kind between the government and the defense in this case, and that nothing contained herein shall be construed to preclude the government from proceeding against the defendant during or after the time period covered by this waiver.

WHEREFORE, the parties request that the time to indict this case be extended to and including April 28, 2022, and that the delay resulting from this extension be excluded in computing the time within which an indictment must be filed pursuant to 18 U.S.C. § 3161(h).

Respectfully submitted,

By: /s/ Raj Parekh   
Raj Parekh  
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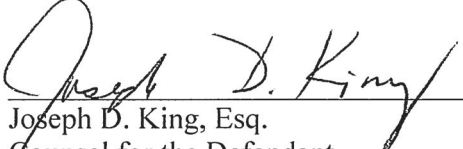
Defendant's Signature: I hereby agree that I have consulted with my attorney and fully understand all my rights with respect to a speedy trial, including my right to be charged by indictment within 30 days of arrest, as required by Title 18, United States Code, Section 3161(b). I have read this motion for an extension of time to be charged by indictment, and carefully reviewed every part of it with my attorney. I understand this motion and voluntarily agree to it.

Date: 2/22/2022

  
ALLISON ELIZABETH FLUKE-EKREN  
Defendant

Defense Counsel Signature: I am counsel for the defendant in this case. I have fully explained to the defendant the defendant's right to be charged by indictment within 30 days of arrest. Specifically, I have reviewed the terms and conditions of Title 18, United States Code, Section 3161(b), and I have fully explained to the defendant the provisions that may apply in this case. To my knowledge, the defendant's decision to agree to an extension of time to be charged by indictment is an informed and voluntary one.

Date: 2/22/2022

  
Joseph D. King, Esq.  
Counsel for the Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on February 23, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ Raj Parekh  
Raj Parekh  
First Assistant United States Attorney